

# Exhibit B

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Aasiyah Meeks, as next of friend and mother of one minor child, A.M., [REDACTED] a [REDACTED], Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Aasiyah Meeks has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.M. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Abony Person, as next of friend and mother of two minor children, I.P. and N.P., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Abony Person has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: N.P. – [REDACTED] 2004, I.P. – [REDACTED] 2001

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

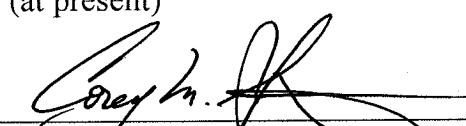
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Akera Davis, as next of friend and mother of two minor children, A.M. and J.M., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Akera Davis has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: A.M. – [REDACTED] 2016, J.M. – [REDACTED] 2011
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Aleantra Montgomery, as next of friend and mother of three minor children, D.T.1, D.T.2 and W.W., [REDACTED] Burton, MI 48529, claimant's counsel can be contacted at 212-605-6200. Aleantra Montgomery has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.T.2 – [REDACTED] 2005, D.T.1 – [REDACTED] 2000, W.W. – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$6,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$6,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Aleen Trumbo, as next of friend and mother of three minor children, T.B.1, T.B.2 and T.J., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Aleen Trumbo has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: T.B.1 – [REDACTED] 2015, T.J. – [REDACTED] 2011, T.B.2 – [REDACTED] 2014
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
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- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$6,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$6,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Alex McCarty, as next of friend and mother of one minor child, W.H., [REDACTED] Metamora, MI 48455, claimant's counsel can be contacted at 212-605-6200. Alex McCarty has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: W.H. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
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- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
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- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Alexandria Corneilius, as next of friend and mother of three minor children, A.B., M.C. and T.S., [REDACTED] Burton, MI 48519, claimant's counsel can be contacted at 212-605-6200. Alexandria Corneilius has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: T.S. – [REDACTED] 2003, A.B. – [REDACTED] 2008, M.C. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

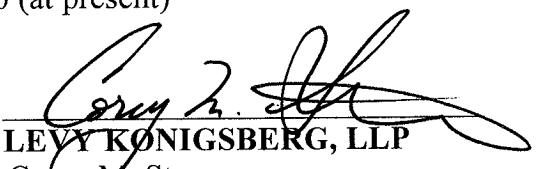
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$6,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$6,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Alexsis Jenkins, as next of friend and mother of one minor child, J.J., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Alexsis Jenkins has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: J.J. – [REDACTED] 2009
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Ali Griffith, as next of friend and father of one minor child, A.P., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Ali Griffith has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.P. – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Alicia Kuykendall, as next of friend and mother of two minor children, S.C. 1 and S.C. 2, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Alicia Kuykendall has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.C.1 – [REDACTED] 20[REDACTED], S.C.2 – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Alicia Little, as next of friend and legal guardian of four minor children, A.I., J.J., N.J. and O.B., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Alicia Little has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.I. – [REDACTED] 2000, J.J. – [REDACTED] 2000, N.J. – 1 [REDACTED] 2006, O.B. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

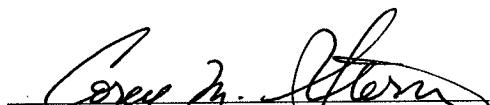
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$8,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$8,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
**LEVY KONIGSBERG, LLP**  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Alicia Morreau, as next of friend and mother of one minor child, L.H., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Alicia Morreau has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: L.H. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Alicia Weidman, as next of friend and mother of one minor child, K.W., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Alicia Weidman has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: K.W. – [REDACTED] 2012
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Alicia Wilson, as next of friend and mother of five minor children, A.W. 1, A.W. 2, K.C., S.C. and M.W., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Alicia Wilson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.W.1 – [REDACTED] 2004, A.W.2 – [REDACTED] 2002, K.C. – [REDACTED] 2010, M.W. – [REDACTED] 2003, S.C. – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$10,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$10,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Alisha Manning, as next of friend and mother of three minor children, J.M. 1, J.M. 2 and M.M., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Alisha Manning has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: J.M.1 – [REDACTED] 2005, J.M.2 – [REDACTED] 2009, M.M. – [REDACTED] 2006
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$6,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$6,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Alisha Patton, as next of friend and mother of one minor child, T.P., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Alisha Patton has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: T.P. – [REDACTED] 2009
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Alisha Pringle, as next of friend and mother of three minor children, A.R.1, A.R.2 and E.R., [REDACTED] Burton, MI 48529, claimant's counsel can be contacted at 212-605-6200. Alisha Pringle has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: A.R.2 – [REDACTED] 2015, E.R. – [REDACTED] 2013, A.R.1 – [REDACTED] 2007
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

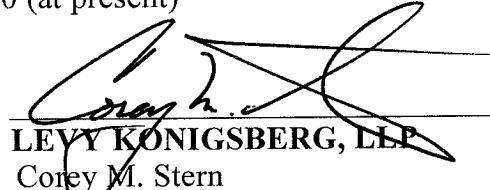
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$6,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$6,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Allen Reid, as next of friend and father of one minor child, A.R., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Allen Reid has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: A.J. – [REDACTED] 1999
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

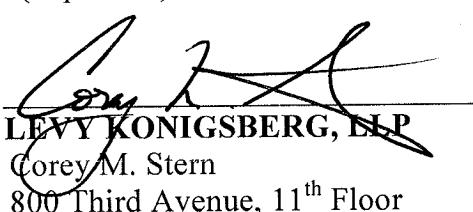
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Alleree Billings, as next of friend and mother of two minor children, H.H. and M.H., [REDACTED], Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Alleree Billings has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: M.H. – [REDACTED] 2005, H.H. – [REDACTED] 2008
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

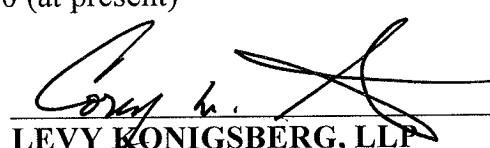
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Alma Fox, as next of friend and mother of two minor children, T.E. and V.W., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Alma Fox has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: T.E. – [REDACTED] 2002, V.W. – [REDACTED] 2005
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

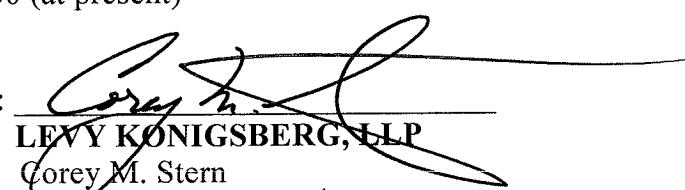
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- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Alma Hill, as next of friend and legal guardian of four minor children, E.H., J.T., K.T. and P.T., [REDACTED] 6 [REDACTED] Swartz Creek, MI 48473, claimant's counsel can be contacted at 212-605-6200. Alma Hill has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.H. – [REDACTED] 2013, J.T. – [REDACTED] 2002, K.T. – [REDACTED] 2005, P.T. – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- g. Darren Lytle, Office of Research and Development, Region 5
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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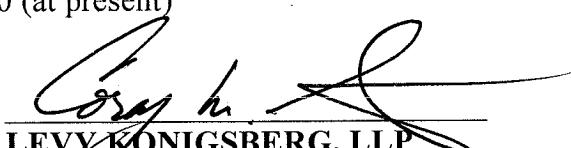
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$8,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$8,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
**LEVY KONIGSBERG, LLP**  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Alonzo Goodman, as next of friend and father of two minor children, A.R. and E.R., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Alonzo Goodman has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.R. – [REDACTED] 2005, E.R. – [REDACTED] 2002

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Alyssa Brown, as next of friend and mother of two minor children, A.B.1 and A.B.2, [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Alyssa Brown has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.B.1 – [REDACTED] 2007, A.B.2 – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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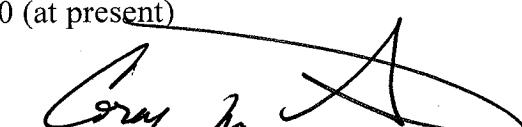
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- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Amanda Smith, as next of friend and mother of two minor children, A.C. and R.C., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Amanda Smith has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.C. – [REDACTED] 2006, R.C. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Amanda Burgess, as next of friend and mother of five minor children, C.W., D.W., M.W., T.W. and K.B., [REDACTED] Burton, MI 48529, claimant's counsel can be contacted at 212-605-6200. Amanda Burgess has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: C.W. – [REDACTED] 2008, D.W. – [REDACTED] 2003, K.B. – [REDACTED] 2007, T.W. – [REDACTED] 2006, M.W. – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$10,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$10,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Amanda Engelmann, as next of friend and mother of two minor children, J.M. 1 and J.M.2, [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Amanda Engelmann has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.W.1 – [REDACTED] 2005, J.W.2 – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

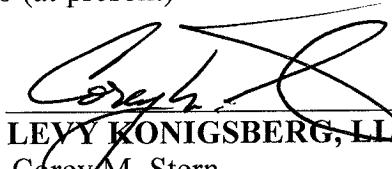
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Amanda Lorick, as next of friend and mother of two minor children, S.T. and D.L., [REDACTED] Lapeer, MI 48446, claimant's counsel can be contacted at 212-605-6200. Amanda Lorick has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: D.L. – [REDACTED] 2014, S.T. – [REDACTED] 2007
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

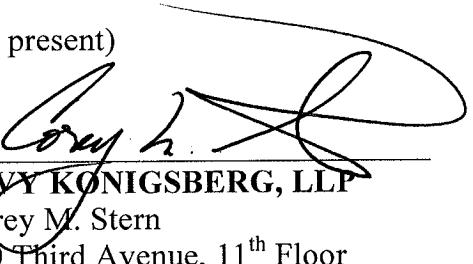
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Amanda McGrath, as next of friend and mother of two minor children, S.M. and D.M., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Amanda McGrath has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: S.M. – [REDACTED] 2008, D.M. – [REDACTED] 2009
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
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- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Amanda Ross, as next of friend and mother of one minor child, A.C., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Amanda Ross has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: A.C. – [REDACTED] 2009
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
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- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

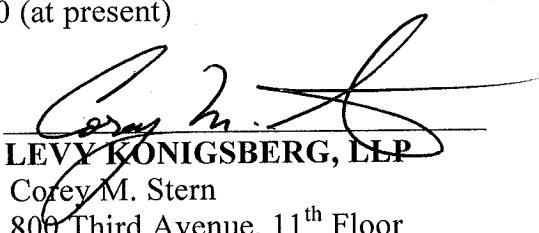
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Amanda Smith, as next of friend and mother of six minor children, A.S. 1, A.S. 2, A.S. 3, J.S. 1, J.S. 2 and J.S. 3, [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Amanda Smith has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.S.1 – [REDACTED] 2006, A.S.2 – [REDACTED] 2015, A.S.3 – [REDACTED] 2013, J.S.1 – [REDACTED] 2014, J.S.2 – [REDACTED] 2008, J.S.3 – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$12,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$12,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
**LEVY KONIGSBERG, LLP**  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Amanda Spooner, as next of friend and mother of five minor children, B.S., G.S., I.S., T.S. and W.S., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Amanda Spooner has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: B.S. – [REDACTED] 2006, G.S. – [REDACTED] 2009, I.S. – [REDACTED] 2014, T.S. – [REDACTED] 2010, W.S. – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

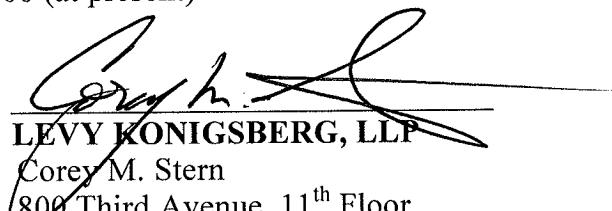
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$10,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$10,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Amara Triplett, as next of friend and mother of one minor child, T.H., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Amara Triplett has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: T.H. – [REDACTED] 2011

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

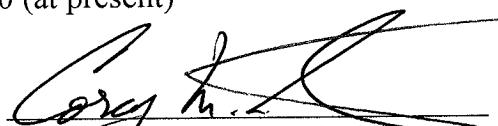
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Amber Heilig, as next of friend and mother of four minor children, E.H. 1, E.H. 2, P.S., and T.S., [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Amber Heilig has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.H.1 – [REDACTED] 2012, E.H.2 – [REDACTED] 2014, P.S. – [REDACTED] 2007, T.S. – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$8,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$8,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Amber Tedhams, as next of friend and mother of two minor children, A.C. and S.C., [REDACTED] [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Amber Tedhams has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: A.C. – [REDACTED] 2011, S.C. – [REDACTED] 2013
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

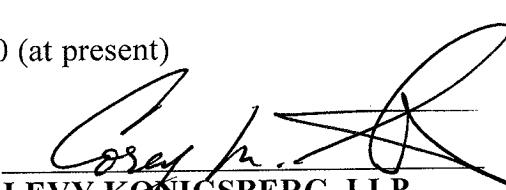
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Amie Dinnan, as next of friend and mother of one minor child, R.R., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Amie Dinnan has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: R.R. – [REDACTED] 2003
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

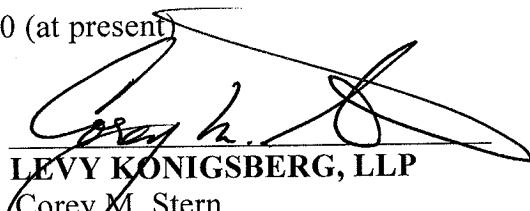
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Amy Scroggins, as next of friend and mother of three minor children, A.S. 1, A.S. 2 and T.S., [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Amy Scroggins has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.S.1 – [REDACTED] 2007, A.S.2 – [REDACTED] 2003, T.S. – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$6,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$6,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Anaesha Thomas, as next of friend and mother of five minor children, A.T., J.T., L.T., K.T. and S.T., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Anaesha Thomas has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.T. – [REDACTED] 2008, J.T. – [REDACTED] 2010, L.T. – [REDACTED] 2013, S.T. – [REDACTED] 2014, K.T. – [REDACTED] 2016

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$10,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$10,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
**LEVY KONIGSBERG, LLP**  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Amy Boyd, as next of friend and mother of two minor children, J.B. and J.T., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Amy Boyd has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.T. – [REDACTED] 2013, J.B. – [REDACTED] 2001

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

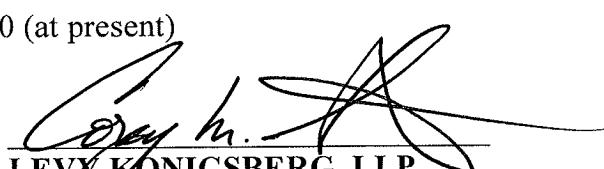
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Anchina Lintz, as next of friend and mother of three minor children, A.H., B.H. and J.L., [REDACTED] Flint, MI 48532, claimant's counsel can be contacted at 212-605-6200. Anchina Lintz has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.H. – [REDACTED] 2001, B.H. – [REDACTED] 2002, J.L. – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$6,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$6,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Andre O'Daniel Jr, as next of friend and father of two minor children, S.D. and T.D., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Andre O'Daniel Jr has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.O. – [REDACTED] 2008, T.O. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

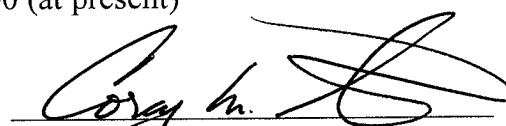
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Andre Stephenson, as next of friend and father of three minor children, A.S. 1, A.S. 2 and A.S. 3, [REDACTED] Kalamazoo, MI 49007, claimant's counsel can be contacted at 212-605-6200. Andre Stephenson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.S.1 – [REDACTED] 2007, A.S.2 – [REDACTED] 2008, A.S.3 – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

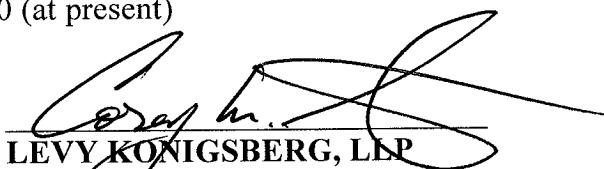
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$6,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$6,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Andrea Loyd, as next of friend and mother of one minor child, D.L., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Andrea Loyd has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: D.L. – [REDACTED] 2011
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: AnDrea Manuel, as next of friend and mother of one minor child, A.K., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. AnDrea Manuel has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: A.K. – [REDACTED] 2012
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Aneisha Evans, as next of friend and mother of four minor children, T.E.1, T.E.2, G.F. and A.F., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Aneisha Evans has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.F. – [REDACTED] 2008, G.F. – [REDACTED] 2010, T.E.1 – [REDACTED] 2014, T.E.2 – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$8,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$8,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
**LEVY KONIGSBERG, LLP**  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Angel Schmidt, as next of friend and mother of two minor children, R.Z. 1 and R.Z.2, [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Angel Schmidt has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: R.Z.1 – [REDACTED] 2011, R.Z.2 – [REDACTED] 2015
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

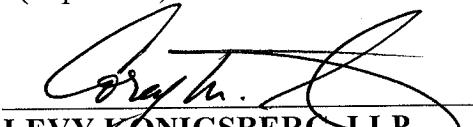
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Angela Garner, as next of friend and mother of one minor child, Z.C., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Angela Garner has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: Z.C. – [REDACTED] 2013
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Angela Hunter, as next of friend and mother of three minor children, L.H., S.H. and Z.H., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Angela Hunter has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: L.H. – [REDACTED] 2006, S.H. – [REDACTED] 2008, Z.H. – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

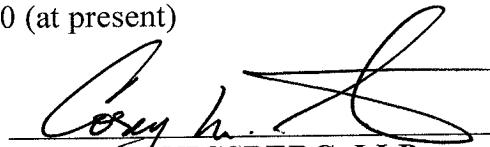
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$6,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$6,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Angela Wilborn, as next of friend and mother of one minor child, G.W., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Angela Wilborn has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: G.W. – [REDACTED] 2003
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

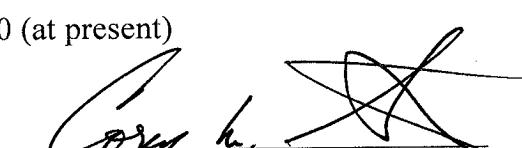
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Angelique Crandell, as next of friend and mother of two minor children, K.S. and Z.C., [REDACTED] Chesaning, MI 48616, claimant's counsel can be contacted at 212-605-6200. Angelique Crandell has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.S. – [REDACTED] 2007, Z.C. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$4,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$4,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY**

**STANDARD FORM 95 (SF-95) REQUIREMENTS**

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Angielic Reed, as next of friend and mother of one minor child, L.R., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Angielic Reed has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: L.R. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

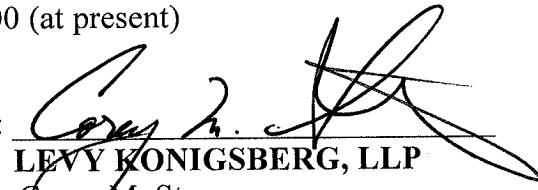
- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
- r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
- v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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- x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
- y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
- z. Dan Kildee, U.S. Representative, Washington DC
- aa. U.S. Senator Debbie Stabenow, Washington DC
- bb. U.S. Senator Gary Peters, Washington DC

12. A. Property Damage Claim: None

B. Personal Injury Damage Claim: \$2,000,000.00

C. Wrongful Death Claim: None

D. Total Damage Claim: \$2,000,000.00 (at present)

13. A. Signature of duly authorized agent:   
LEVY KONIGSBERG, LLP  
Corey M. Stern  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022

B. Telephone of agent: 212-605-6200

14. Date of Signature: 3/6/2017

**STATEMENT OF FACTS AND BASIS FOR CLAIM**